

July 5, 2006

SUBJECT: USDA-approved Software Requirements Regarding Vitamin A

TO: Regional Directors
Special Nutrition Programs
All Regions

There have been several questions from State agencies regarding how USDA-approved software reports vitamin A in the nutrient analysis of menus for School Meals Initiative (SMI) requirements. A shift in how vitamin A data is presented in USDA-approved software has occurred because the vitamin A nutrient requirement is no longer presented in Retinol Equivalents (RE) in the Dietary Reference Intakes recommendations, manufacturers are no longer reporting RE data for their products, and the USDA National Nutrient Database for Standard Reference no longer reports vitamin A in RE. Furthermore, Nutrition Facts labels report vitamin A in percent of International Units (IU).

Although the National School Lunch Program regulations define the requirements for vitamin A in units of RE, the Food and Nutrition Service (FNS) has since the inception of Nutrient Standard Menu Planning, requested that software developers use the attached nutrient standard specifications for comparing menu analyses to the defined nutrient requirements. The nutrient standard specification provides the requirement for vitamin A in both RE and IU. USDA-approved software developers are aware that displaying both units for vitamin A data is preferred. However, they have the option to display vitamin A in either RE or IU within the nutrient analysis reports.

When State agencies are given data for vitamin A in IU from a USDA-approved software program, it is acceptable to use the IU data as it is presented or they may convert the vitamin A data using the 1 RE to 5 IU ratio. For example, if the report displays 1125 IU of vitamin A, the State agency can manually convert the data to units of RE by dividing by 5 for a total of 225 units of RE for vitamin A. Likewise the RE data can be converted to IU by multiplying the units of RE by 5. It is important to note that if data is reported in both IU and RE, any discrepancy for the 1:5 ratio can be attributed to the combination of analytical and calculated RE data.

Please share this information with your State agencies so that they are aware that USDA-approved software developers have the information necessary to accurately report the nutrient analysis of the vitamin A requirement in units of Retinol Equivalents (RE) and/or International Units (IU).

A handwritten signature in dark ink, appearing to read "Stanley C. Garnett", with a stylized, cursive script.

STANLEY C. GARNETT
Director
Child Nutrition Division

Attachment